

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT

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UNITED STATES OF AMERICA :
v. : Criminal No. 2:15-cr-99
RAYMOND EDWARDS, :
Defendant :
:

INDICTMENT

COUNT ONE

The Grand Jury charges:

On or about November 6, 2014, in the District of Vermont, the defendant, RAYMOND EDWARDS, used a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, namely, a video image file identified as IMG_3794.MOV, which visual depiction was produced using materials that had been shipped and transported in or affecting interstate or foreign commerce.

(18 U.S.C. § 2251(a))

COUNT TWO

The Grand Jury further charges:

On or about November 20, 2014, in the District of Vermont, the defendant, RAYMOND EDWARDS, knowingly possessed at least one matter which contained visual depictions that had been shipped and transported using any means and facility of interstate and foreign commerce, and shipped and transported in and affecting interstate and foreign commerce, and which were produced using materials which had been mailed, and so shipped and transported, by any means including by computer, where the producing of such visual depictions involved the use of minors engaging in sexually explicit conduct and such visual depictions were of such conduct.

(18 U.S.C. § 2252(a)(4)(B))

A TRUE BILL

FOREPERSON

Eric S. Miller (BAM)
ERIC S. MILLER
United States Attorney

Burlington, Vermont
July 9, 2015